

**SC Guidance  
Standard Review Plan  
Worker Safety and Health Programs  
November 30, 2006**

Office of Science (SC) contractors are required to submit a Worker Safety and Health program meeting the regulatory criteria contained in §851.11 of 10 CFR 851, *Worker Safety and Health Program*, by February 26, 2007. The purpose of this document is to provide general SC guidelines for review of the submitted programs. Tailoring of these guidelines to meet specific operational needs is permissible.

**Worker Safety and Health Program Submittal:** The following submittal format should be used to provide consistency across the SC complex. SC expects a single Worker Safety and Health (WSH) Program to be submitted from the site prime contractor. This single WSH Program should include the mechanism through which the prime contractor requires lower tier subcontractors to comply with the Rule, in advance of their work at DOE sites. The submittal should be clear, concise, in the range of 15-25 pages in length (excluding attachments), and include the following:

- Signature Page for use by the Field/Site Office Manager.
- Executive Summary (e.g., brief summary of work activities, locations, number of personnel).
- Principal programs (e.g., Integrated Safety Management System Description Document, Work Smart Standards addressing DOE ISMS requirements, including incorporation of 10 CFR 851 criteria into these programs).
- Summary discussion of contractor implementation processes (e.g., flowdown of requirements and coordination with other contractors, subcontractors, and sub-tier contractors and their programs and procedures) used to address criteria contained in subparts §851.10-§851.27.

The following attachments should also be provided with the submittal, as appropriate:

- 10 CFR 851 Implementation Matrix (Crosswalk Matrix), documenting review of Rule criterion (e.g., Regulatory Citations, Applicability Determination; and Implementing Mechanisms (e.g., references to plans, procedures).
- For off-site work locations, describe whether DOE or OSHA has jurisdiction, and which DOE Site Office is responsible for the Worker Safety and Health (WSH) program.
- Listing of workplace safety and health requirements contained in §851.23 & §851.27 applicable to contractor activities.
- Other safety and health standards as required by §851.23(b).
- Lists of Closure Facility hazards and controls.
- Equivalencies granted prior to promulgation of the Rule in accordance with the equivalency provisions of the Codes or Standards.

## Attachment A

- Description of the processes for developing equivalencies where allowed by Codes or Standards.

**Schedule:** The contractor and Field/Site Office should agree on a schedule that meets the following commitments. Additionally, the Field/Site Office should review drafts of their contractors' Worker Safety and Health Programs in a phased approach so as to ensure the program can be approved when submitted. This phased review is expected to include the contractor's analysis of potential gaps with the rule's requirements, any associated corrective actions, and the resulting crosswalk matrix. If there are major issues with implementation, the Field/Site Office Manager should inform SC COO well in advance of the compliance dates.

- January 15, 2007: Site Office list of proposed/draft variances due to SC-31.1.
- February 26, 2007: Contractor's final WSH Program and variance requests due to Field/Site Office, with a copy to SC-31.1. Subcontractors' final WSH Program due to prime contractor for review and approval.
- May 25, 2007: Deadline for Field/Site Office approval of prime contractor's WSH program, and prime contractor approval of subcontractor's WSH programs.

**Gap Analysis:** The contractor should conduct a review of 10 CFR 851 requirements versus existing program mechanisms to identify areas that may need to be added/modified to ensure full compliance with applicable 10 CFR 851 requirements.

For each identified gap, the contractor should document:

- 10 CFR 851 Section Number.
- The nature of the gap between 10 CFR 851 vs. current contractor policy/procedure.
- An explanation of why this is a gap.
- Organizations impacted by the gap.
- Potential impact on cost/schedule.
- Proposed resolution.
- Cost/schedule impact of proposed resolution.

**SC Field/Site Office Approval:** Field/Site Office Manager Approval means the manager is reasonably assured that the contractor's written Worker Safety and Health Program describes the methods by which the contractor will comply with the applicable rule requirements, provides for a safe and healthful workplace, and can be implemented and integrated with other programs and management systems. The approval does not validate each functional element or referenced method of the contractor's Worker Safety and Health Program. This validation is a continual programmatic oversight function of the field element. Approval of any variances, equivalencies, and/or lists of closure facility hazards and controls may occur after the submittal of the contractor's written program.

## Attachment A

Personnel at the Integrated Service Center are also available to assist SC Site Offices with reviews. An example Standard Review Checklist is provided in the Appendix to facilitate review of contractor programs. This checklist should not be used as a table of contents for the WSH Program. Checklist items should be expanded to cover all subparagraphs of 10 CFR 851 applicable to contractor operations.

**Appendix: Office of Science Standard Review Checklist**

	Program Elements/Review Criteria		Comments	Approved Yes/No	Resolution	Date
<b>1.</b>	Executive Summary					
<b>2.</b>	Scope/exclusions					
<b>3.</b>	Integrated Safety Management System (ISMS)					
<b>4.</b>	Flowdown of Worker Safety and Health Requirements					
	4.1	Overview				
	4.2	Technical Staff and ES&H Responsibilities				
	4.3	Procurement Interface				
	4.4	Types of Flowdown				
	4.5	Construction Subcontracting				
	4.6	Lower Tier Subcontractors				
<b>5.</b>	Implementing Processes					
	5.1	Overview				
	5.2	WSH Program – General Requirements (10 CFR 851.10)				
	5.3	Development and Approval of the WHS (10 CFR 850.11)				
	5.3.1.	Preparation, Evaluation and Approval				
	5.3.2.	Coordination with Other Contractors and Labor Organizations				
	5.3.3.	Program Updates				
	5.3.4	Process for reviewing and approving subcontractor's WSH Programs				
	5.4	Implementation (10 CFR 851.12)				
	5.5	Compliance (10 CFR 851.13)				
	5.6	Worker Protection Goals and Objectives, Management Responsibilities, Worker Rights and Responsibilities, and System to Ensure Compliance with Established Work Practices (10 CFR 851.20)				
	5.7	Hazard Identification and Assessment (10 CFR 851.21)				

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	5.8	Hazard Prevention and Abatement (10 CFR 851.22)				
	5.9	Safety and Health Standards, including additional standards determined to be needed beyond those specified (10 CFR 851.23)				
	5.10	Applicable Functional Areas (10 CFR 851.24)				
	5.10.1	Construction Safety (Appendix)				
	5.10.2	Fire Protection (Appendix)				
	5.10.3	Explosive Safety (Appendix)				
	5.10.4	Pressure Safety (Appendix)				
	5.10.5	Fire Arms Safety (Appendix)				
	5.10.6	Industrial Hygiene (Appendix)				
	5.10.7	Biological Safety (Appendix)				
	5.10.8	Occupational Medicine (Appendix)				
	5.10.9	Motor Vehicle Safety (Appendix)				
	5.10.10	Electrical Safety (Appendix)				
	5.10.11	Other Functional Areas Needed to Address Workplace Hazards				
	5.10.12	Chronic Beryllium Disease Prevention Program (CBDPP), 10 CFR 850				
	5.11	Training and Information (10 CFR 851.25)				
	5.12	Recordkeeping and Reporting (10 CFR 851.26)				
	5.13	Reference Sources (10 CFR 851.27)				
<b>6.</b>	Program assessments					
<b>7.</b>	Variance Process					
<b>8.</b>	Appendices					
	8.1	Acronyms, Abbreviations, and Initialisms				
	8.2	List of Memorandum of Understandings & Agreements				
	8.3	Implementation Matrix for 10 CFR Part 851				

## Attachment A

	8.4	List of Applicable Workplace Safety and Health Requirements from 10 CFR 851, Section 851.23 and Section 851.27				
	8.5	List of Other Applicable Workplace Safety and Health Requirements				
	8.6	Lists of Closure Facility hazards and controls (10 CFR 851.21(b))				
	8.7	Equivalencies Granted Prior to Promulgation of the Rule in accordance with the Equivalency Provisions of the Codes or Standards (10 CFR 851.23)				